



Columbia Riverkeeper
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September 6, 2016

U.S. Environmental Protection Agency
Attn: Harbor Comments
805 SW Broadway, Suite 500
Portland, OR 97205

Sent via email to: harborcomments@epa.gov

Dear U.S. Environmental Protection Agency,

Columbia Riverkeeper ("Riverkeeper") submits these comments to the U.S. Environmental Protection Agency ("EPA") regarding the EPA's proposed plan to clean up the Portland Harbor Superfund site ("proposed plan"). Riverkeeper is a nonprofit public interest group with approximately 12,000 members and supporters working to protect and restore the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. To achieve these objectives, Riverkeeper operates scientific, educational, and advocacy programs aimed at protecting water quality and habitat in the Columbia River Basin. Riverkeeper's members and supporters fish, boat, swim, work, and live in and along the Portland Harbor reach of the Willamette River, and in the Columbia River downstream from Portland Harbor.

None of the alternatives in EPA's proposed plan would achieve the most important goal of the cleanup effort: allowing people to safely catch and eat resident fish from Portland Harbor. Permanently substituting Fish Consumption Advisories for actual river cleanup is arbitrary and ineffective, and therefore does not satisfy EPA's obligations under CERCLA. The final result of the cleanup should be lifting the Fish Consumption Advisories related to PCBs and other contaminants of concern for Portland Harbor, and meeting Oregon's water quality criteria for fish consumption, by a specific date. Accordingly, Riverkeeper requests that EPA adopt the proposed plan's Alternative G—with the enhancements described in comments by Willamette Riverkeeper and the Portland Harbor Community Coalition—to improve the long-term effectiveness of the cleanup.

Sincerely,

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Columbia Riverkeeper